

925 Telecom LLC dba Range Networks Robocall Mitigation Plan

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I. Introduction

Robocalls continue to plague our communication networks, causing disruptions and annoyances. Our Robocall Mitigation Plan addresses this issue comprehensively while implementing a Three Strike policy for clients who engage in suspicious activities.

II. Purpose and Scope

This plan applies to all interconnected partners whose traffic originates on, transits through, or terminates through the 925 Telecom network.

III. Regulatory Compliance and Collaboration

925 Telecom complies with the TCPA, Truth in Caller ID Act, TRACED Act, FCC RMD requirements, STIR/SHAKEN mandates, and ITG traceback procedures. Traffic is not accepted from providers unregistered in the FCC RMD.

IV. Technology-Based Solutions

1. Full STIR/SHAKEN Implementation (as of December 1, 2023): ensuring widespread implementation of STIR/SHAKEN standards to enable accurate caller ID authentication.
2. Robocall Detection using advanced machine learning algorithms to identify and block known spam callers and suspicious call patterns.
3. Caller ID Reputation Database used to track the behavior of calling entities and enhance call authentication.
4. Media IP Reputation Database used to track the behavior of source media IPs and enforce blocking from our entire network when appropriate.

V. Stir/Shaken Attestation Policy

- A-Attestation is granted only when numbers are purchased and assigned directly by 925 Telecom after KYC approval.
- B-Attestation is granted when clients are fully vetted and provide verifiable proof of number ownership or right-of-use.
- C-925 Telecom does not sign C-attested calls. For transit traffic received with C-attestation from upstream providers, calls are subject to enhanced scrutiny and may be passed downstream or blocked based on risk analysis, traceback status, and compliance indicators.

VI. Ensuring We Know Our Clients (KYC)

All clients must complete a Know Your Client (KYC) application that includes verifying corporate formation, Federal EIN, FCC Registration Number, 499 FILER ID, address verification (proof of address is required as a supporting document), corporate contacts, and industry-known trade references. During the KYC review, the client's robodialer mitigation plan is reviewed to ensure all FCC requirements are met. Before approving the interconnection request, we confirm that each client is a legitimate business and that their traffic is mitigated appropriately and efficiently.

VII. Traffic Monitoring

Traffic is continuously monitored using key performance and fraud-detection indicators, including Answer Seizure Ratio (ASR), Average Call Duration (ACD), short-duration call analysis, burst-traffic detection, invalid or spoofed ANI validation checks, and industry traceback correlation.

VIII. Prohibited Traffic & Consent

Robocalls, spoofing, scam traffic, and calls placed without TCPA-compliant consent are expressly prohibited under 925 Telecom's Master Service Agreements. Customers are contractually required to comply with all applicable federal and state laws and regulations, including the TCPA and FCC robocall mitigation requirements, as a condition of service.

IX. Enforcement

1. Robust client monitoring system to detect suspicious call traffic and behavior, including third-party filtering software such as, but not limited to, RoboGuard powered by FraudCentral.io, SOMOS Do Not Originate, DNC block, Blacklisted Inbound blocks (Media Ips, OCNs, and ANIs).
2. Enforce a strict Three Strike policy for clients who engage in suspicious or illegal call activities, including but not limited to US Telecom tracebacks.

Strike 1 – Upon a first violation, the client is issued a warning and must provide written confirmation of the actions taken to mitigate the identified traffic.

Strike 2: Upon a second violation, the client is subject to temporary suspension of services pending a review of the client’s traffic, mitigation efforts, and compliance with applicable laws and regulations. The client must provide written confirmation of all corrective actions taken to mitigate the identified traffic.

Strike 3 – A third violation results in the permanent termination of services for the client.

X. Traceback Response & Law Enforcement Collaboration

925 Telecom is committed to responding to traceback notices from the US Telecom Group within 24 hours. A dedicated team is established to respond, providing the necessary information promptly.

Multi-Stakeholder Collaboration: Coordinate and cooperate with industry stakeholders, regulatory authorities, law enforcement agencies, and the registered traceback consortium, as appropriate, to share information and best practices and to support the identification, investigation, and mitigation of suspected unlawful robocall activity.

XI. Ongoing Monitoring and Improvement

925 Telecom implements and maintains a documented robocall mitigation program consistent with 47 CFR § 64.6305. The effectiveness of the program is continuously monitored through defined key performance indicators (KPIs) designed to identify, assess, and remediate potential unlawful robocall activity. In addition, 925 Telecom maintains a consumer feedback and complaint intake mechanism for the reporting of false positives and false negatives. Such feedback is reviewed as part of the Company’s ongoing compliance oversight and is used to inform adjustments to mitigation controls and program enhancements, as appropriate.

XII. Transparency

925 Telecom publishes regular reports outlining our actions to mitigate robocalls, including traceback efforts and Three Strike Rule enforcement.

XIII. Resource Allocation

925 Telecom allocates necessary resources, including personnel, technology, and budget, to support the successful execution of this plan.

XIV. Review and Adaptation / Periodic Review / Periodic Check of Client Data

925 Telecom conducts regular and ongoing reviews of its robocall mitigation program, policies, and operational controls to ensure continued effectiveness and compliance with FCC rules and applicable laws. This includes periodic assessments of traffic patterns, mitigation performance, and enforcement outcomes, as well as routine reviews and updates of client KYC, consent, and registration data. Findings from these reviews are used to adapt and enhance mitigation measures, address emerging risks, and ensure alignment with evolving regulatory and industry requirements.

XV. Record Retention

925 Telecom maintains records necessary to support its robocall mitigation, STIR/SHAKEN, KYC, and enforcement obligations in accordance with applicable FCC rules and industry best practices. Records are retained for a minimum of two (2) years, or longer where required by law or regulatory request.

Such records may include, but are not limited to:

- Call Detail Records (CDRs) and signaling data
- STIR/SHAKEN authentication and verification data
- Traceback requests and response documentation
- Customer KYC materials and supporting documentation
- Robocall mitigation actions, enforcement decisions, and remediation records
- Customer complaints and false positive/negative reports

Records are securely stored and made available to the FCC, law enforcement, or the registered traceback consortium upon lawful request. Retention and access controls are periodically reviewed to ensure continued compliance and data integrity.